

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PARTS iD, LLC, a New Jersey limited liability company,
Plaintiff,

v.

IDPARTS LLC, a Massachusetts limited liability company,
Defendant.

Civil Action No. 20-cv-11253-RWZ

JOINT MOTION FOR EXTENSION OF TIME

Plaintiff/Counterclaim Defendant PARTS iD, LLC and Defendant/Counterclaim Plaintiff IDParts LLC, through counsel, jointly agree and stipulate to the extensions of certain deadlines to permit the parties to complete party depositions in advance of discovery deadlines. In view of the upcoming discovery deadlines, the parties jointly request that the Court modify the schedule through and including the following dates:

Event	Current Deadline (Dkt. No. 28)	Proposed Deadline
Completion of Discovery Deadline	February 24, 2022	April 15, 2022
Deadline for <i>Daubert</i> Motions and Dispositive Motions	February 24, 2022	May 13, 2022
Responses	March 17, 2022	June 3, 2022
Reply	March 28, 2022	June 17, 2022
Final Pretrial Conference	May 4, 2022	July 27, 2022, or at the Court's convenience

Trial Date and Length	TBA at Final Pretrial Conference	TBA at Final Pretrial Conference

The parties filed a Joint Stipulated Motion for an Extension of Time on September 24, 2021 (Dkt. 71) and the Court granted the request on September 30, 2021 (Dkt. 73). Since then, the parties have continued to work diligently to complete remaining discovery, but have not yet completed necessary fact and expert depositions. However, counsel for the parties are actively working to find mutually agreeable dates for the remaining depositions. The parties have further agreed that given the potential impact of the information received from the depositions on material aspects of this case, additional time is needed for the subsequent motion deadlines.

With regard to the depositions, the parties' ability to proceed with scheduling depositions for two fact witnesses, namely Steven Royzenshteyn and Roman Gerashenko, is currently outside their control. Messrs. Royzenshteyn and Gerashenko are the founders of plaintiff PARTS iD LLC and PARTS iD identified them in its Initial Disclosures as individuals likely to have discoverable information that PARTS iD may use to support its claims. However, Messrs. Royzenshteyn and Gerashenko are no longer employed by PARTS iD. Messrs. Royzenshteyn and Gerashenko individually moved to quash IDParts' subpoenas in the U.S. District Court for the District of New Jersey and the parties are waiting for that court to issue a decision on the motion. *See PARTS ID, LLC v. IDPARTS, LLC*, D.N.J. Case No. 3:21-cv-19229-ZNG-LHG.

Although the parties remain hopeful that the depositions of fact witnesses can be completed promptly, in the event that a ruling on the pending Motion to Quash Subpoenas is not issued with enough time to schedule the depositions before April 15, 2022, IDParts reserves its right to seek additional relief from this Court to allow it to take the depositions of Messrs.

Royzenshteyn and Gerashenko and to attend to any additional discovery that may arise as a result of information gained through these depositions.

The parties therefore respectfully request that the Court enter the proposed order lodged herewith extending all scheduling deadlines.

Respectfully submitted,

/s/ John Strand

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Dated: February 14, 2022

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CERTIFICATE OF SERVICE

I certify that this document is being filed through the Court's electronic filing system, which serves counsel for other parties who are registered participants as identified on the Notice of Electronic Filing (NEF). Any counsel for other parties who are not registered participants are being served by first class mail on the date of electronic filing.

/s/ John Strand

John Strand